

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION

CASE NO. 00-6035-Cr-Zloch

UNITED STATES OF AMERICA, :

Plaintiff, :

v. :

RAYMOND MCDERMOTT and :

MARTHA TREMINIO DIAZ a/k/a :

MARTHA MCDERMOTT, :

Defendants. :

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CLERK OF COURT  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE, FLORIDA  
ms

UNOPPOSED MOTION FOR LEAVE TO TRAVEL

Defendants, Raymond McDermott and Martha Treminio Diaz (a/k/a Martha McDermott), by and through their undersigned counsel, hereby file this Unopposed Motion to modify the conditions of their probation so as to allow them to travel to El Salvador to visit the family of Martha McDermott and in support of this Motion says:

1. The Defendants were sentenced on July 21<sup>st</sup>, 2000 to eighteen (18) months probation, both Defendants have reported to the Probation Department as required and have complied with all the conditions of their probation, including the payment of restitution.

2. Mrs. McDermott's family reside in the country of El Salvador. Mr. and Mrs. McDermitt would like to be able to visit her family and spend the upcoming Christmas Holidays with them.

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3. The standard conditions of probation imposed in this case do not allow the Defendants to travel outside of the United States without permission of the Court.

4. Mark Ciolek, the United States Probation Officer who is supervising the probation for both Raymond McDermott and Martha McDermott has **no objection** to this Court modifying the conditions of probation in this case so as to permit the McDermotts to travel to El Salvador to visit her family.

5. Assistant United States Attorney Debra J. Stuart, the prosecutor in this case, has **no objection** to this Court modifying the conditions of probation to permit Raymond McDermott and Martha McDermott to travel to El Salvador to visit her family.

**WHEREFORE**, Raymond McDermott and Martha McDermott respectfully move this Honorable Court to enter an Order modifying the conditions of their probation to permit them to travel to El Salvador to visit Martha McDermott's family, so long as their travel is pre-approved by the United States Probation Office.

Respectfully submitted

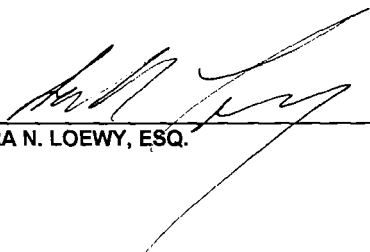
**BIERMAN, SHOHAT, LOEWY & KLEIN, P.A.**  
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By: 

**IRA N. LOEWY, ESQ.,**  
**Fla Bar No. 200794**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered by mail this 22<sup>nd</sup> day of November, 2000, to: Debra J. Stuart, Esq., Assistant United States Attorney, 505 South East 2<sup>nd</sup> Street, Suite 200, Ft. Pierce, Florida 34950, and to Mark Ciolek, U. S. Probation Officer, 6100 Hollywood Boulevard, Suite 501, Hollywood, FL 33024.

  
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IRA N. LOEWY, ESQ.